

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS GALVESTON
DIVISION**

**MICHAEL BAZZREA, SABRINA WILDER,
COURTNEY CHEATUM, TIMOTHY
JORDEN, CALEB WADSWORTH,**

**For themselves and all others similarly
Situated,**

Plaintiffs

v.

**ALEJANDRO MAYORKAS, in his Official
capacity as Secretary of the U.S.
DEPARMENT OF HOMELAND SECURITY,**

**LINDA L. FAGAN, in her official capacity as
Commandant of the UNITED STATES
COAST GUARD,**

**LLOYD AUSTIN, in his official capacity as
Secretary of the U.S. DEPARTMENT OF
DEFENSE,**

**JANET WOODCOCK, in her official capacity
as Acting Commissioner of the U.S. FOOD
AND DRUG ADMINISTRATION**

Defendants

Civil Action No. 3:22-cv-00265

**DECLARATION OF RACHEL SARAN
IN SUPPORT OF
EMERGENCY MOTION FOR TRO**

Declaration of Rachel Saran

I, Rachel Saran, declare under penalty of perjury that the following is true and correct:

1. I am over the age of 18 years, have personal knowledge of the matters set forth in this Declaration, and if called upon to testify to them, I would and could do so competently.
2. I am a paralegal for Dale Saran, Attorney-at-Law.

3. I am in consistent contact with both the 5 named plaintiffs and the 125 intervenor plaintiffs and am aware of all of their individual situations regarding their impending discharge from the Coast Guard.

4. Of the five named plaintiffs:

- a. PO3 Timothy Jorden has been discharged. His wife was 8 months pregnant at the time. He received his discharge on Aug. 11, 2022, as he was running out of terminal leave days. This made him ineligible to receive Veterans Affairs Benefits and left his wife and newborn child without medical care or insurance.
- b. PO2 Sabrina Wilder received her Notice of Intent to Discharge from the Defendant Coast Guard on Aug. 24, 2022, with a recommendation for a General Discharge. A General Discharge would cause Plaintiff Wilder to lose her post-9/11 GI Bill and VA Benefits that she's otherwise earned by her service. She is also the breadwinner for her husband and 2-year-old daughter, who rely on her benefits and healthcare, both of which are within days of being lost. She is waiting to get an outdate from EPM and unsure of how to plan for her and her family's future.
- c. LT Caleb Wadsworth received his Notification to Show Cause for retention in the Coast Guard before a Board of Inquiry on Oct. 4, 2022. He will submit his comments to the Board on this Friday, October 14, 2022. Plaintiff Wadsworth, a Coast Guard rescue helicopter pilot, has also been passed over for promotion from O-3 (Lieutenant) to O-4 (Lieutenant Commander) despite a 78% selection rate. If he does not promote next summer, he will not be allowed to continue service based on "failure to promote," despite having submitted RAR and a sterling record of service.

5. Out of the 125 intervenor plaintiffs, four have recently been discharged: A.J. Schur, Alexis Colasurdo, Marc Block, and Brett Schmitt. One Reserve Intervenor, Dan Morrissey, has been dropped to the Inactive Status List (ISL).

- a. Both A.J. Schur and Alexis Colasurdo were cadets at the Coast Guard Academy prior to

being disenrolled because of their vaccination status. Alexis Colasurdo was pulled from her summer assignment on June 13, 2022, and reported back to the Academy to receive a page 7 notification that she would be disenrolled. A.J. Schur reported back on June 22, 2022, and received her page 7 notification that she would be disenrolled.

- b. Both cadets submitted their appeals to disenrollment on June 30th with the other unvaccinated cadets. On August 15th, the day after the cadets returned to the Academy from summer leave, all of the appeals were universally denied. On August 18th all of the cadets were called into a meeting and told they had less than 24 hours to pack up everything they owned and leave the Academy; however, they had not yet received their DD-214s or been told if they were officially disenrolled or discharged, leaving them in limbo.
- c. Plaintiff Colasurdo was able to have her mother to come pick her up, but A.J. Schur was left homeless. The Coast Guard was made aware of A.J.'s housing situation and would not offer any assistance or resources. Alexis Colasurdo's family took Plaintiff A.J. Schur in for 45 days while both women awaited communication from the Coast Guard Academy. On September 23rd, both cadets received notice via phone call that they were disenrolled from the Academy and Alexis was mailed her DD-214 and paperwork. Upon being disenrolled, Alexis immediately picked up a full-time job at a non-profit working in a 24-hour home for individuals with mental and intellectual disabilities. She is trying to continue her education however she cannot reach anyone at the Academy for information on benefits and tuition at her current university.
- d. A.J. Schur is still homeless, so she does not have a mailing address or P.O. Box to receive her paperwork. She has received no help from the Coast Guard whatsoever and is currently living in a hotel in Kansas City by herself. She is trying to see if she can get into a shelter for homeless veterans through a local non-profit in Kansas City. She is 20 years old.

6. Marc Block and Brett Schmitt were discharged from the Coast Guard on July 17, 2022, and September 5, 2022, respectively.

7. Dan Morrissey was given orders to ISL on Sept. 26, 2022, however, the orders were deemed “effective” on August 25, 2022, meaning that he had been pushed to ISL a month before he was notified. His healthcare was also dropped without his knowledge on September 22, 2022, 4 days before being notified.

8. Of the remaining 125 intervenor plaintiffs, at least 20 have discharge dates. Of the 20 with dates, 15 have discharge dates before 1 December 2022. Of the 15, 11 will be out of the Coast Guard in the next three weeks: Josh Candelaria, Matt Powers, Courtney Keith, Benjamin Coutts, Andrew Larsen, Richard Hardwick, Chad Atwood, Ryan Curry, James Merrill, Cody Hauser, and Mark Byrd.

9. I have supporting documentation for all of the above assertions, including discharge paperwork, notices, and emails.

I declare under penalty of perjury, under the laws of the United States that the foregoing statements are true and correct to the best of my knowledge.

Executed this 12th day of October, 2022.

A handwritten signature in black ink, appearing to read "Rachel Saran", written over a horizontal line.

Rachel Saran, Paralegal